

### **REMARKS**

After entry of the above amendments, claims 1-2, 4-15, and 17-38 will be pending in the present application. Claims 3 and 16 have been cancelled. Claims 1-2, 4, 14-15, 17, and 27-29 have been amended to incorporate elements from cancelled claims, to explicitly recite what was implicit, to change claim dependencies in light of claim cancellations, and/or to correct informalities. New claims 37-38 have been added. Support for the claim amendments and the new claims can be found in the claims as originally filed and in the specification. Applicant reserves the right to pursue any amended claim in its original form and any cancelled claim in a continuation application. No new matter has been added.

### **Objections to the Abstract**

The Abstract has been objected to for referring to “purported merits or speculative applications of the invention” (June 29, 2006 Office action, pg. 2). Applicant has amended the Abstract to remove language objected to by the Examiner. Therefore, withdrawal of the objections to the Abstract is respectfully requested.

### **Claim Rejections**

Claims 1-6, 9, 13-19, 22, 26-31, and 36 have been rejected under 35 U.S.C. § 102(b) as being anticipated by “Efficient Storage of XML Data” by Kanne, et al. (hereinafter “Kanne”). Claims 7-8, 20-21, and 32-33 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Kanne, in view of U.S. Patent No. 6,658,652 to Alexander, et al. (hereinafter “Alexander”). Claims 10-12, 23-25, and 34-35 have been rejected under 35 U.S.C. § 103(a) as being

unpatentable over Kanne, in view of Alexander, and further in view of U.S. Patent No. 6,938,204 to Hind, et al. (hereinafter "Hind").

Claim 1, as amended, recites:

1. A method for storing a structured document in its native format in a database, the method comprising:  
receiving a structured document;  
generating a hierarchical node tree comprising a plurality of nodes, wherein the node tree represents the structured document; and  
storing the plurality of nodes in at least one record in the database, wherein each record comprises a node slot array, the node slot array including a plurality of node slots, each node slot including a pointer pointing to one of the plurality of nodes in the hierarchical node tree.

In the Office action, the Examiner states:

With respect to claims 3, 16 and 29 Kanne [sic] discloses method, computer readable medium, and system wherein each record comprises a plurality of node slots, wherein each node slot includes a pointer pointing to a node of the plurality of nodes (See figure 2, shows nodes pointing to other nodes in a hierarchical fashion) (Section 2.1, paragraph 1, lines 3-6, paragraph 2 lines 1-2 explain the slots and how they relate to the node tree.).

(June 29, 2006 Office action, pg. 4).

The passage of Kanne cited by the Examiner states:

The core of the system is a "classical" record manager which is responsible for disk memory management and buffering. It accesses raw disks or file system files and provides a memory space divided into segments, which are a linear collection of equal-sized pages. Pages can be as large as 32K. Each page can be a plain page (for indices and user-defined structures), or holds one or more records. Pages are organized as slotted pages, records are identified by a pair (pageid, slot) (called record ID or RID).

On top of the record manager operates a tree storage manager that, maps the trees used to model documents (see section 2.2 below) into records. The methods used in this tree storage manager are the topic of this paper.

(Pg. 3 of Kanne).

Although Kanne states “[p]ages are organized as slotted pages”, it does not disclose, teach, or suggest that “each record comprises a node slot array, the node slot array including a plurality of node slots, each node slot including a pointer pointing to one of the plurality of nodes in the hierarchical node tree,” as recited in claim 1. In particular, Kanne only states that “records are identified by a pair (pageid, slot) (called record ID or RID),” it does not disclose, teach, or suggest that “each record comprises a node slot array, the node slot array including a plurality of node slots,” as recited in claim 1.

In addition, as pointed out by the Examiner, Figure 2 of Kanne only “shows nodes pointing to other nodes in a hierarchical fashion.” Claim 1, in contrast, recites “each node slot including a pointer pointing to one of the plurality of nodes in the hierarchical node tree.” Hence, the “pointer” recited in claim 1 is a pointer from a “node slot” to a “node”. It is not a pointer from one node to another node, as suggested by the Examiner.

Therefore, based at least on the reasons above, Applicant respectfully submits that claim 1, and the claims that depend therefrom, are not anticipated by Kanne. Given that claims 14 and 27 each recite elements similar to those of claim 1, it is respectfully submitted that those claims, and the claims that depend therefrom, are not anticipated by Kanne for at least the same reasons.

Alexander and Hind do not disclose, teach, or suggest, and the Examiner does not cite to any passage of Alexander or Hind as disclosing, teaching, or suggesting, the elements recited in claim 1. Since neither Alexander nor Hind cures the deficiencies of Kanne, Applicant respectfully submits that claim 1, and the claims that depend therefrom, are also patentable over Kanne, in view of Alexander, and further in view of Hind. Given that claims 14 and 27 each


recite elements similar to those of claim 1, it is respectfully submitted that those claims, and the claims that depend therefrom, are patentable over Kanne, in view of Alexander, and further in view of Hind for at least the same reasons.

### **CONCLUSION**

On the basis of the above remarks, reconsideration and allowance of the claims is believed to be warranted and such action is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

Respectfully submitted,  
SAWYER LAW GROUP LLP

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Erin C. Ming  
Attorney for Applicant(s)  
Reg. No. 47,797  
(650) 475-1449